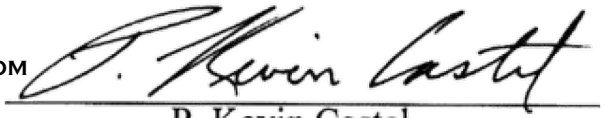


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Application GRANTED.
SO ORDERED.
Dated: 5/21/2024


P. Kevin Castel
United States District Judge

May 17, 2024

Via ECF

Hon. P. Kevin Castel, United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: USA v. Eugene Austin
23-Cr-508 (PKC)

Dear Judge Castel:

I represent Mr. Austin in the above matter. I am submitting this letter motion as a request for a temporary modification of Mr. Austin's bail conditions. Mr. Austin is currently on home detention as part of his bail package.

Last week, Mr. Austin's close friend, John Michael (Jack) Quinn, passed away in Washington, DC. Mr. Austin's friendship with Jack Quinn, which includes his friendship with Mrs. Quinn and their child, dates back to 2011. Jack Quinn's memorial service will be held on May 29, 2024, in Washington, DC. A copy of his obituary, which details the date and time of the memorial service, is attached. Mr. Austin would like permission to attend that service. He intends to travel from his home in Port Jefferson, Long Island to Washington via the LIRR and Amtrak in the early morning on May 29, returning late that evening.

With that in mind, I am seeking a temporary modification of Mr. Austin's bail conditions to allow him to travel to Washington, DC to attend the memorial service. Pre-Trial has no objection to the proposed modification; the Government takes no

Hon. P. Kevin Castel, United States District Judge

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position. Accordingly, I am respectfully requesting that the Court make a temporary modification of Mr. Hugh Austin's bail to allow him to travel to and from Washington, DC on May 29, 2024.

Thank you for your consideration in this matter.

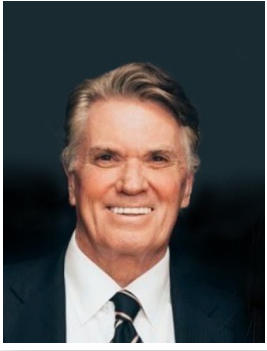
Very truly yours,

A handwritten signature in black ink, appearing to be "David K. Bertan", written over the closing "Very truly yours,".

David K. Bertan

DKB

cc: AUSA Andrew Chan (via ECF)



John Michael Quinn

August 16, 1949 - May 08, 2024

John Michael Quinn, known as Jack, died peacefully at his home in Washington D.C. on May 8, 2024, surrounded by his family. He was 74 years old.

Jack was a brilliant strategist, but his most cherished roles were father, husband, and friend. He loved his family, and they adored him in return.

Jack was born in Brooklyn, New York, on August 16, 1949, to William and Mary “Eileen” Quinn. He was raised in Glen Head, Long Island. Jack was one of five children. The siblings were known in the neighborhood as close-knit, the kind of family that always looked out for each other. Jack’s father worked as a manager at a ConEd power plant. His mother, Mary, was a homemaker, who wrangled her brood to regularly attend Mass.

For high school, Jack took the train to Manhattan to attend Xavier High School, a rigorous Catholic boys’ school from which he graduated in 1967. Steeped in Jesuit roots, Xavier taught students to “take responsibility for their lives, lead with integrity, act justly in service to others, pursue excellence and deepen their relationship with God.” Throughout his life, Jack sought to uphold those principles each and every day.

Jack continued his Jesuit education at Georgetown University in Washington, DC. The first in his family to attend college, Jack proudly graduated from Georgetown in 1971. He went on to earn a Law Degree from Georgetown University Law Center, where he was the editor of the Georgetown Law Journal.

In college and beyond, Jack collected lifelong friends. He had a gift for drawing people in with his warm smile and empathetic spirit. Rob Liberatore, Jack’s freshman roommate at Georgetown, who remained a close friend over the last 53 years, recalled fondly, “Jack had that charm, that twinkle in his eye. Everyone falls in love a little bit with Jack.” Rob also said that Jack was “brilliant,” though “he never came to class!”

Jack’s interests lay elsewhere, outside the lecture hall. America was in the throes of the Vietnam War, and the country was buzzing with social unrest. Jack’s sharp instincts and his talent for understanding people drew him to the world of politics, which he viewed as a path to change the world. In his sophomore year, Jack started working full-time on Capitol Hill for Democrat George McGovern, the Senator from South Dakota and presidential nominee for the Democratic Party in 1972. At the time, McGovern chaired the U.S. Senate Select Committee on Nutrition and Human Needs.

From 1973 to 1975, still an undergraduate, Jack went to work as a legislative assistant to Senator Floyd K. Haskell, the Democrat from Colorado. Later, still just 26-years-old, Jack directed the presidential campaign of Mo Udall in the 1976 Democratic presidential election. He was the youngest presidential campaign manager in history.

After obtaining his law degree, Jack launched his storied legal career at the Washington, DC, firm Arnold & Porter. He would eventually lead the firm's thriving lobbying division.

Politics, however, was always in his heart. For Senator Al Gore's 1988 presidential campaign, Jack served as counsel and communications director. He was again a Gore advisor when Gore was chosen as Bill Clinton's running mate in 1992. Among other roles, he coordinated Gore's preparation for the vice-presidential debates. With a whip-smart mind and a gift for thoughtful discourse, Jack was the perfect advisor for many politicians seeking counsel, throughout his life.

After the 1992 presidential election, Jack was appointed Deputy Chief of Staff and Counsel to Vice President Al Gore. Soon enough, he was promoted to Chief of Staff to the Vice President of the United States, retaining the Counsel to the Vice President title. In September 1995, Quinn became White House Counsel to President Bill Clinton, serving in that role until early 1997.

When Quinn left the White House, he returned to Arnold & Porter. Three years later, he would co-found, along with his friend Ed Gillespie, the renowned firm Quinn Gillespie & Associates.

In 2013, Jack became co-counsel representing a group of 9/11 survivors and families who sought justice against Saudi Arabia for supporting and financing Al Qaeda's attacks, but were stymied by sovereign immunity barriers. Jack very quickly became an instrumental member of a small working group to change the sovereign immunity law. Their efforts were met with massive resistance by the Saudi royal family and other foreign actors, the national security establishment, people doing business with the Saudis, and more. For years, the issue was intensely litigated behind the scenes on policy and legal grounds.

In 2016, Jack and his colleagues were ultimately successful in passing the Justice Against Sponsors of Terrorism Act (JASTA), which allowed domestic victims of terrorism to pursue civil claims against foreign governments. President Obama vetoed JASTA. According to his friend and co-counsel Sean Carter, "Jack was instrumental in persuading Congress to pass JASTA, and then overwhelmingly override the president's veto."

Jack immediately went to work to help the 9-11 survivors and families to gain access to classified evidence collected by the United States government of the Saudi's support of Al Qaeda. He led efforts to convince President Biden to issue an executive order in 2021 to mandate a declassification review of FBI investigative files and CIA reports on Saudi Arabia's involvement with Al Qaeda and its attack on the United States.

Carter summarized Jack's impact in this way, "Jack felt that the United States government was not on the right side of justice, and that it was important for the 9-11 community, for the country and for the historical record to know the truth.

In the not too distant future, these families – and all U.S. citizens – will have the benefit of seeing a complete body of evidence of support for Al Qaeda. That would not have happened without Jack."

Later in life, Jack found sobriety. With it, he gained a tight circle of support from like-minded, Washingtonian men. Close friend Gordon (Bill) Peterson, sober for 38 years, describes Jack as someone who cared deeply about his fellow humans and helped many along their personal journeys, whatever they may have been.

"We loved Jack, and we know Jack loved us. It was a wonderful kind of fraternity," says Bill.

Every Saturday morning for many years, Jack, Bill, and their crew of friends, would meet for breakfast, connecting and conversing, sharing their ups and downs, and supporting one another throughout good times and challenging times, always with humor and encouragement.

“A woman came up to me one day and asked, ‘What group is this?’ I said, ‘We are old friends and we have been getting together like this every Saturday for years,’” recalls Bill. “And she said, ‘Well, you look so happy.’ That was true of Jack.”

During the last year, Jack was surrounded by his loving family and longtime friends. He was tended to daily and with care by his devoted wife, Susanna. In his final weeks, his daughter, Megan Quinn, was also a tremendous help in caring for Jack.

In a recent holiday card sent to their family and friends, Jack wrote a poem. It reflects the tenets he learned as a Jesuit and sought to live in his life:

May we seek opportunities to love and help serve, and never take unfair advantage.

May we remember to cut off anger, before it has time to rise.

May we never forget to be generous toward the needy, even when that requires sacrifice.

May we live up to our commitments, and make amends, and may we seek forgiveness when we overlook them.

May the year ahead surprise us with celebrations of peace and harmony.

Jack is survived by his beloved wife, Susanna Monroney Quinn, eight children, and 12 grandchildren.

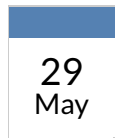
His children include son Jonathan Quinn of Steamboat, Colorado and daughter Megan Quinn of Tacoma, Washington from his first marriage to Burdett Rooney, daughter Caitlin Slaviero of Sydney, Australia and son Brendan Quinn of New York City, New York from his second marriage to Diane O'Brien, son Storm Quinn and daughter Jocelyn Quinn, Susanna's daughter from a previous marriage whom he adopted, Kathleen Quinn of Garwood, New Jersey and Jessica Delpizzo of Arlington, Virginia from earlier, separate relationships.

Jack is also survived by brother Kevin Quinn of Glen Head, New York and is preceded in death by sisters Mary Jane (Quinn) Moran and Patsy Quinn, and brother William Quinn.

In lieu of flower Memorial Donations may be made in Jack's name to <https://www.stalbansschool.org/lsgiving>.

Services for Jack will be held at the Washington National Cathedral, 3101 Wisconsin Avenue NW Washington DC 20016 on Wednesday, May 29, 2024 at 11:00am with a reception to follow at the Cathedral.

Events



CELEBRATION OF LIFE

11:00 AM

Washington National
Cathedral 3101
Wisconsin Ave NW,
Washington, DC
20016
